

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**RONAIL BROWN, FREDERICK DAVIS,  
JR., ERIC VICKERS and JAMEZ  
WILLIAMS,**

**Plaintiffs,**

**v.**

**BESTWAY RENTALS, INC.**

**Defendant.**

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**CASE NO.: 2:06cv261-WHA**

**JOINT MOTION FOR EXTENSION OF CERTAIN DEADLINES**

COME NOW the parties, by and through the undersigned counsel, and request of this Honorable Court a sixty (60) day extension of the dispositive motion deadline and a thirty (30) day extension of the discovery deadline. As grounds for this motion, the parties state the following:

1. The dispositive motion deadline is November 30, 2006 – which is a full six months before the May 30, 2007, pretrial hearing.
2. Discovery is currently set to end on February 27, 2007.
3. To date the parties are engaging in discovery and have exchanged written discovery.
4. To date, both parties have also made FOIA requests to the United States Equal Opportunity Commission. However, the EEOC represented to Defendant that it cannot locate one of the Plaintiff's EEOC files. Defendant intends to follow-up with the EEOC on the whereabouts of the file and would like to obtain such file before any deposition of this Plaintiff.
5. The parties are currently working on scheduling a large number of depositions, which include the four plaintiffs and several former management employees of Defendant.
6. In this regard, the parties are working diligently to schedule dates that are mutually

acceptable to the parties.

7. In light of the ongoing discovery and the rapidly approaching dispositive motion and discovery deadlines, the parties are in need of additional time to conduct discovery and file any dispositive motions.

8. Such additional time would allow: (1) Plaintiffs and Defendant adequate time in which to conduct discovery; and (2) adequate time in which to review the information and prepare any dispositive motions. The parties have also discussed engaging in settlement discussions during this time.

9. This motion is not made for the purposes of delay. The parties file this motion jointly and assert that no prejudice will be caused due to the extension of the dispositive motion and discovery deadlines.

**WHEREFORE**, for the foregoing reasons, the parties respectfully request this Honorable Court for a sixty (60) day extension of the dispositive motion deadline and a thirty (30) day extension of the discovery deadline.

**Dated this 20th day of October, 2006.**

s/ Maricia Woodham

Maricia Woodham, Esq.  
(BEN050)

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